

*This is what  
Ms Mosley sent me first no page ② and  
page for she says I need more information to answer*

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM BRANCH

Plaintiff

v.

RUSSIAN, et al.,

Defendants

No. 1:00-CV-1728

(Judge Conner)

ELECTRONICALLY FILED

**FILED**  
HARRISBURG, PA  
AUG 05 2004  
MARY E. D'ANDREA, CLERK  
Per Deputy Clerk

**DEFENDANTS' RESPONSES TO PLAINTIFF'S INTERROGATORIES**

"5. How many of the defendants have been order[sic] to enter a drug or alcoholic program, now or in the past.[sic]"

ANSWER:

None.

"7.

How many of the defendants[sic] who have grievances written against them has the D.O.C. or the union or the courts, found guilty and yet no Record punished for mistreating inmates or other staff members." [sic]

ANSWER:

None.

"8.

How many of the defendants has the D.O.C. found guilty of any misconduct; what was the misconduct, and what was the punish[sic]."[sic]

*Ms Martin admitted she was in Drug + alcoholic program and that she was a Biker Babe meaning she freely had sex with the whole club and was also Raped*  
*My Beye a inmate eq 3494 was kicked in the Butt by Mr Scalzo yet no misconduct in his Record [sic]*

Milton Friedman - Mr. Friedman's responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix C.

Kim Griffith - The complaint alleges that plaintiff shared with Griffith his view that Officer Russian had abused the policy concerning security searches. *See Complaint at p. 3.* The complaint also alleges that plaintiff advised Mr. Griffith of his view that Officer Russian had retaliated against him and that Mr. Friedman could not fairly investigate his grievances. The complaint does not allege that Griffith did anything unlawful.

Elaine Martin - The complaint alleges that Ms. Martin moved plaintiff to a different cell block after he complained. *See Complaint at p. 5.* This allegation is admitted.

Carol Surace - Ms. Surace's responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix K.

David Gorman - The complaint alleges that plaintiff advised Mr. Gorman of his complaints about Officer Russian's searches. It does not allege that Mr. Gorman did anything unlawful.

Timothy Welling - Lieutenant Welling's responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix E.

Wayne Gavin - Captain Gavin's responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix H.

William Gagas - The Reverend Gagas' responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix G.

Joseph Scalzo - The complaint does not allege that Scalzo did anything.

Christina Wilbur - Ms. Wilbur's responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix J.

Ronald Richards - The complaint does not allege that Mr. Richards did anything unlawful.

Martin Walsh - Mr. Walsh's responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix I.

Barry Karwowski - Officer Karwowski's responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix F.

Julie Suchy - Ms. Suchy's responses to plaintiff's allegations are set forth in his declaration which is contained in Documents in Support of Defendants' Motion for Summary Judgment filed on December 31, 2003 as Appendix A.

Christopher Jones - Mr. Jones denies depriving plaintiff of due process.

Martin Horn - Mr. Horn denies legal responsibility for the actions of subordinates of which he had no personal knowledge or involvement solely because of his former position as the Secretary of the Department of Corrections.

"What did [the defendants] do when I informed them of an act by another staff member"[sic]

**ANSWER:** This interrogatory does not provide sufficient information to permit the defendants to respond to it.

**Respectfully submitted,**

**GERALD PAPPERT**  
**Attorney General**

**By: s/ Gwendolyn T. Mosley**  
**GWENDOLYN T. MOSLEY**  
**Senior Deputy Attorney General**  
**Attorney I.D. No. 29157**

**Office of Attorney General**  
**15<sup>th</sup> Floor, Strawberry Square**  
**Litigation Section**  
**Harrisburg, PA 17120**  
**(717) 787-1180**

**SUSAN J. FORNEY**  
**Chief Deputy Attorney General**  
**Chief, Litigation Section**

**Counsel for Defendants**

**Dated: July 9, 2004**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM BRANCH	:	
	:	
Plaintiff	:	No. 1:00-CV-1728
	:	
v.	:	(Judge Conner)
	:	
RUSSIAN, et al.,	:	
	:	
Defendants	:	ELECTRONICALLY FILED

**CERTIFICATE OF SERVICE**


I, Gwendolyn T. Mosley, Senior Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on July 9, 2004, I caused to be served a true and correct copy of the foregoing document titled Defendants' Responses to Plaintiff's Interrogatories, by depositing it in the United States Mail, first-class postage prepaid to the following:

William Branch, CF 3756  
SCI-Waymart  
P.O. Box 256  
Waymart, PA 18472

s/ Gwendolyn T. Mosley  
Gwendolyn T. Mosley  
Senior Deputy Attorney General

open Here ~~no~~ *no* *all mail*

*mailed*



7002 1000 0005 3998 5537

CF3756 Branch  
Po Box 256  
Waymart Pa 18472

INMATE MAIL  
PA. DEPT. OF CORRECTIONS

*leged mail*

Judge Conner  
Po Box 983  
HARRISBURG Pa 17108